IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

GUANG QING JIANG :

:

v. : Case #1:23-cv-10029

:

UR M JADDOU,
ANDREA J. QUARANTILLO,

ALEJANDRO N. MAYORKAS,
DAMIAN WILLIAMS and
MERRICK B. GARLAND
:

PLAINTIFF'S MOTION TO ADJOURN INITIAL PRETRIAL CONFERENCE

TO THE HONORABLE ARUN SUBRAMANIA, JUDGE OF THE SAIDCOURT:

Plaintiff, Guang Qing Jiang, by and through counsel, Todd Edward Henry, Esquire, respectfully requests this Honorable Court adjourn the Initial Pretrial Conference for 60 days, and in support thereof, states as follows:

- 1. On November 15, 2023, Plaintiff filed a Complaint in the Nature of Mandamus in the above-captioned matter.
 - 2. An Initial Pretrial Conference is scheduled January 16, 2024.
- 3. Plaintiff's counsel is starting a codefendant jury trial before the Honorable Scott L. Palk in the United States District Court for the Western District of Oklahoma. The case is <u>U.S.A. v. Jeff Weng</u>, 5:23-cr-00237-SLP-1.
- 4. Plaintiff's counsel spoke with the government's counsel. The government is still gathering information regarding the allegations contained in Plaintiff's Complaint.
 - 5. The government is unopposed to this request.
 - 6. There have been no prior requests to adjourn.

The initial pretrial conference is rescheduled for March 18, 2024, at 10 a.m. Counsel shall notify the Court promptly if they become available before that date.

SO ORDERED.

Arun Subramanian, U.S.D.J. Date: January 5, 2024

WHEREFORE, Plaintiff, Guang Qing Jiang, respectfully requests this
Honorable Court grant his uncontested Motion to Adjourn, and adjourn the Initial
Pretrial Conference for 60 days.

Respectfully submitted,

THE HENRY LAW FIRM

By: Todd Edward Henry, Esquire 1500 Walnut Street, Suite 1060 Philadelphia, PA 19102 (215) 545-7100 (office) (215) 545-6611 (fax) Attorney for Plaintiff

|s| Todd Henry

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CERTIFICATE OF SERVICE

I, Todd Edward Henry, Esquire, hereby certify that I am this 3rd day of January 2024 electronically filing Plaintiff's unopposed Motion to Adjourn Initial Pretrial Conference using the CM/ECF System, which will automatically send notification of same to all counsel of record.

THE HENRY LAW FIRM

By: Todd Edward Henry, Esquire 1500 Walnut Street, Suite 1060 Philadelphia, PA 19102

ls! Todd Henry

(215) 545-7100 (office) (215) 545-6611 (fax) Attorney for Plaintiff